

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES D. PIERON, JR.,

Defendant.

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Case 1:18-cr-20489

**DEFENDANT’S MOTION FOR CONTINUANCE**

TO THE HONORABLE COURT:

NOW COMES DEFENDANT, James D. Pieron, Jr. (“Defendant” or “Pieron”), by and through undersigned counsel, Michael Louis Minns and Ashley Blair Arnett, and respectfully requests this Court continue the trial date and pretrial conference for the above captioned case, for the reasons set forth in the Memorandum in Support of Defendant’s Motion for Continuance filed herewith.

Respectfully submitted on October 31, 2018

MINNS & ARNETT

/s/ Ashley Blair Arnett

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
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UNITED STATES OF AMERICA,

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Case 1:18-cr-20489

**MEMORANDUM IN SUPPORT OF  
DEFENDANT’S MOTION FOR CONTINUANCE**

TO THE HONORABLE COURT:

NOW COMES DEFENDANT, James D. Pieron, Jr. (“Defendant” or “Pieron”), by and through undersigned counsel, Michael Louis Minns and Ashley Blair Arnett, and submits this Memorandum in Support of Defendant’s Motion for Continuance, respectfully moving this Court to grant a continuance of the December 4, 2018 trial date and the November 14, 2018 pretrial conference for the reasons set forth below.

First, Defendant agrees that the period of time reflected in this continuance is excludable pursuant to 18 U.S.C. § 3161(h)(8) from the time period within which trial must commence as set forth in 18 U.S.C. § 3161(c)(1).

Second, in support, counsel state that the age and complexity of the case and the extensive documentary discovery provided by the Government and the extensive discovery still in the possession of the Government make it unreasonable to expect adequate preparation in the statutory time limits. The indictment covers a nine year period. The Government has many documents in

its possession that have not yet been turned over. These documents needs to be reviewed to adequately prepare for a defense and determine what witnesses may have relevant information, and to locate and interview potential witnesses.

Finally, in addition to the present case, Michael Minns and Ashley Arnett are scheduled for a three-week trial in *United States v. Jack Stephen Pursley*, in the Southern District of Texas, Cause No. 18-CR-575, scheduled to begin November 27, 2018; Ken Sasse has a trial scheduled to begin January 22, 2019 before Judge Parker in Flint, Michigan in *United States v. Alan Black*, No. 17-20656 (estimated length about a week), and *United States v. Juan Olaya*, No. 15-20200 (estimated length two to three months) scheduled to begin March 4, 2019 before Judge Michelson in Detroit. Undersigned counsel need time to prepare for these cases as well.

Respectfully submitted on October 31, 2018

MINNS & ARNETT

/s/ Ashley Blair Arnett

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*Attorneys for James Pieron, Jr.*

**CERTIFICATE OF CONFERENCE**

On October 30, 2018, the undersigned emailed AUSA Janet Parker that undersigned was set for a three-week trial in Houston starting on November 27, 2018. AUSA Parker responded that she needed more information to have a position on this motion.

/s/ Ashley Blair Arnett  
Ashley Blair Arnett

**CERTIFICATE OF SERVICE**

This is to certify that on this the 31st day of October 2018, a true and correct copy of the above and foregoing instrument was served upon all counsel of record.

/s/ Ashley Blair Arnett  
Ashley Blair Arnett